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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re TFT-LCD (FLAT PANEL) ANTITRUST
LITIGATION

This Document Relates To:

*Motorola Mobility, Inc. v. AU Optronics
Corporation, et al., C 09-5840 SI*

*Target Corporation, et al., v. AU Optronics
Corporation, et al., 3:10-cv-4945 SI*

Master Docket No. 07-m-1827 SI

**THIRD STIPULATION AND
[PROPOSED] ORDER REGARDING
RULE 30(B)(6) DEPOSITION OF
PHILIPS ELECTRONICS NORTH
AMERICA CORPORATION AND
FACT DISCOVERY CUT-OFF**

1 Defendant Philips Electronics North America Corporation ("PENAC") and Plaintiffs
 2 Motorola Mobility, Inc.; Target Corp.; Sears, Roebuck and Co.; Kmart Corp.; Old Comp Inc.;
 3 Good Guys, Inc.; RadioShack Corp; and Newegg Inc. ("Plaintiffs") stipulate as follows:

4 WHEREAS on November 2, 2011, Plaintiffs initially served a notice of deposition of
 5 PENAC pursuant to Federal Rule of Civil Procedure 30(b)(6) ("November 2, 2011 30(b)(6)
 6 Notice");

7 WHEREAS the Court previously extended the time for Plaintiffs to take the deposition of
 8 PENAC to April 30, 2012;

9 WHEREAS PENAC is still diligently working to produce documents to Plaintiffs, and
 10 expects to complete its production in March 2012;

11 WHEREAS Plaintiffs and PENAC have met and conferred regarding scheduling the Rule
 12 30(b)(6) deposition of PENAC;

13 WHEREAS the parties agree that the discovery cutoff should be further extended in order
 14 to permit PENAC time to complete its production and Plaintiffs time to review the produced
 15 documents before the deposition; and

16 THEREFORE, PENAC and Plaintiffs, by their respective, undersigned counsel, stipulate
 17 and agree as follows:

18 1. The fact discovery cutoff date of December 8, 2011 set forth in the Order
 19 Modifying Pretrial Schedule for "Track One" Direct Action Plaintiff and State Attorney General
 20 Cases (MDL Dkt. No. 3110) is extended up to and including June 1, 2012, solely as to the
 21 deposition of PENAC.

22 2. PENAC shall retain its right to object to any subsequent notice and the topics
 23 therein.

24 3. If disputes arise at the deposition, Plaintiffs will have five court days to move to
 25 compel further responses.

26 4. Unless expressly provided herein, nothing in this Stipulation and Order is intended

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1 to modify any other Order of the Court or the Special Master, nor does this order prevent any
2 party from seeking further modifications to such orders.

3 Dated: March 22, 2012

4 /s/ Nathaniel J. Wood

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**Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the
filing of this document has been obtained from the other signatories.**

IT IS SO ORDERED.

Dated: 3/22, 2012



Susan Illston, United States District Judge

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